

# 2018-2022 Consolidated Plan 2020 Amendment Sandy Springs, GA



05/03/18

**AMENDED 05/19/2020**

U.S. Department of Housing and Urban Development Atlanta Regional Office Five Points  
Plaza Building 40 Marietta Street Atlanta, GA 30303



## **Executive Summary**

### **ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

The Consolidated Plan is a 5-year plan which describes the City's community development priorities and multiyear goals based on an assessment of housing and community development needs, an analysis of housing and economic market conditions, and available resources.

The Consolidated Plan is carried out through action plans, which are adopted annually. Each Annual Action Plan provides a concise summary of the actions, activities, and the specific federal and nonfederal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

#### **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The Needs Assessment identifies Public Improvements and Infrastructure and Public Service as the priority needs for the City. The City has determined that completion of the Roswell Road Multiyear Sidewalk Project, begun under the 2008-2012 Consolidated Plan and continued under the 2013-2017 Consolidated Plan, will be the initial project for the 2018-22 Consolidated Plan. The CDBG Program for this project will fulfill the Suitable Living Environment objective and Availability/Accessibility outcome of the CPD Performance Measurement Framework. Any future Public Service projects will also be required to fulfill one of the three objectives [(1) Decent, Affordable Housing, (2) Suitable Living Environment, and (3) Economic Opportunities] and the three outcomes [(1) Availability/Accessibility, (2) Affordability, and (3) Sustainability].

#### **Section 108 Loan Guarantee Program – Consolidated Plan Minor Amendment**

CDBG regulations 24 CFR Part 570.700 describe a process whereby Sandy Springs can leverage up to 5 times its most recent CDBG allocation from HUD to increase the impact of its CDBG funds and benefit to LMI residents.

In the summer of 2017, the City applied for an advance on its future CDBG allocations permitted under the Section 108 Loan Program in order to, more efficiently, complete Phase III of the South Roswell Road Multiyear Project. Phase III will include right-of-way appraisals, and acquisition, installation of pedestrian lighting, handicap ramps, and brick pavers from I-285 down to Long Island Drive which are identified LMI (low/moderate income) target areas.

In January 2018, HUD awarded the City of Sandy Springs the loan guarantee assistance under Section 108 in the principal amount of \$2.8 million.

The Section 108 Loan Guarantee Program funds represent the infusion of a considerable amount of funding at once that will have a direct benefit on the LMI residents of the City.

### **COVID-19 Pandemic Response**

In March 2020, Georgia was affected by the COVID-19 pandemic. In order to lessen the impact of the virus, the City of Sandy Springs along with many other local municipalities, issued a shelter-in-place order. This was done in the interest of public health, however it has led to negative economic impacts. In April 2020, it was announced that in addition to the City's normal grant allocation, an additional grant would be awarded to the City as part of the CARES Act. The City anticipates the possibility of using the 2020 grant allocation to ameliorate negative economic impacts resulting from the COVID-19 pandemic. And, if needed, the City desires the ability to target up to 15% of the CDBG funds currently on hand and what may be awarded to the City in 2021 to further assist in economic recovery. To accomplish this, the City plans to distribute funds to local non-profits that serve those who are low or moderate income individuals as well as provide economic development loans to small businesses that serve or employ those who are low or moderate income individuals. The City will also explore other ways to assist in the pandemic response in compliance with HUD guidelines, should they arise.

The City will also amend the Citizen Participation Plan in 2020 to add emergency provisions that allow the City to respond to a crisis in a more efficient and timely manner.

### **3. Evaluation of past performance**

Under the Phase I of the Roswell Road Multiyear Sidewalk project, the City was able to construct 1.5 miles of sidewalks from Dalrymple Road to Northridge Road, and another 2 miles under Phase II from Northridge Road to the Chattahoochee River. Both phases included the installation of street lights, ADA ramps, brick pavers, and landscaping. Additionally, under Phase II the City completed sidewalk improvements on the north side of Hightower Trail to the Community Assistance Center, the City's largest non-profit public service provider.

Based on the significant pedestrian improvements in the corridor, it is the City's desire to continue with the project and complete Phase III, which will afford the same access and safety to LMI residents South of I-285 along Roswell Road from Long Island Drive to The Prado and from Lake Placid Drive to Northwood Drive.

### **4. Summary of citizen participation process and consultation process**

The City of Sandy Springs adopted its Citizen Participation Plan in 2006 last updated in 2017. The plan serves as the City's official policy for involving the community in the development of all planning documents related to the CDBG program, and the evaluation of the program's annual performance.

In conformance with the Citizen Participation Plan, the City held the required public hearing and meetings to solicit comments on community needs prior to creation of a draft 5-year Consolidated Plan. Those meetings were as follows:

1. Public Hearing on Tuesday, December 5, 2017 at 6:00 p.m. (Sandy Springs City Hall)
2. Open House on Wednesday, December 13, 2017 at 6:00 p.m. (Sandy Springs City Hall)
3. Needs Assessment Wednesday, January 10, 2018 at 6:00 p.m. (Sandy Springs City Hall)

In addition to receiving public comments and consulting with service organizations, the City of Sandy Springs maintains a webpage dedicated to the CDBG Program and the development of the Consolidated Plan in an effort to broaden public participation in the City's process. The City also has a dedicated email address ([cdbgprogram@sandyspringsga.gov](mailto:cdbgprogram@sandyspringsga.gov)) to allow questions or comments to be sent to the City on any aspect of the CDBG program.

#### **2018-2022 Consolidated Plan 2020 Amendment**

In conformance with the Citizen Participation Plan, the City held the required public hearing and meetings to solicit comments on community needs prior to substantially amending the Consolidated Plan. Those meetings were as follows:

1. Public Hearing, Draft Review, and Public Comment Period Announcement on Thursday, May 7, 2020, at 4:00 p.m. (Sandy Springs Virtual Meeting)
2. Public Hearing and Annual Action Plan Adoption on Tuesday, May 19, 2020 at 6:00 p.m. (Sandy Springs Virtual Meeting)

#### **5. Summary of public comments**

Over the course of the Citizen Participation process discussed above, the Community Development Department staff consulted with the following agencies:

<ul style="list-style-type: none"> <li>- Child Development Association</li> <li>- Community Assistance Center</li> <li>- The Drake House</li> <li>- Families First</li> <li>-Friends of the Sandy Springs Library</li> <li>-Heritage Sandy Springs</li> <li>-Homestretch</li> <li>-Los Ninos Primero</li> <li>-Mary Hall Freedom House</li> <li>-Sandy Springs Christian Church</li> <li>-City of Brookhaven</li> <li>-Fulton County</li> </ul>	<ul style="list-style-type: none"> <li>-Sandy Springs Mission</li> <li>-Sandy Springs Regional Library</li> <li>-Sandy Springs Education Force</li> <li>-Sharon Community Church -U</li> <li>Hope CDC, Inc.</li> <li>-Center for Pan Asian Community Services</li> <li>-Atlanta Regional Commission</li> <li>-City of Atlanta</li> <li>-City of Roswell</li> <li>-Cobb County</li> <li>-City of Dunwoody</li> </ul>
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Broadband and Resilient organizations were also consulted.

Through the community participation process, staff received comments from The Drake House organization, which indicated a desire to be considered for funding, as well as from the Latin American Association in regards to affordable housing opportunities for Latinos within the city and region. Also, two property owners were interested in funding to address and solve storm water issues in their residential subdivision property. Public hearing minutes is provided in the Appendix.

#### **Citizen Participation-Section 108 Loan Guarantee Program Amendment**

No comments have been received on the Section 108 amendment in response to advertising the amendment or during the public hearing held on June 6, 2017.

#### **2018-2022 Consolidated Plan 2020 Amendment**

No comments have been received at this time.

### **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments and views were accepted by the City during the Citizen Participation process

### **7. Summary**

Based on the Needs Assessment and Market Analysis, the City determined that the most appropriate use of its CDBG allocation during the 2018-22 Consolidated Planning period is for Public Improvements and Infrastructure and Public Service projects. Due to the previous project undertaken with CDBG funds,

the initial focus of the plan will be to complete the Phase III of the Roswell Road Multiyear Sidewalk Project as outlined in the 2018 Annual Action Plan. In summer 2017, the City applied for the Section 108 loan to obtain alternative financing to complete the Phase III of the South Roswell Multiyear Project in order to complete it more efficiently and in a single effort.

In January 2018, HUD awarded the City of Sandy Springs the loan guarantee assistance in the principal amount of \$2.8 million under the Section 108 program.

Based on the current situation, the City determined that portions of its 2020 CDBG allocation may be used for the COVID-19 response, as well as all of CARES Act allocation for the 2020 program year. And, if needed, the City desires the ability to target up to 15% of the CDBG funds currently on hand and what may be awarded to the City in 2021 to further assist in economic recovery. The City proposes to fund activities that ameliorate the negative economic impacts of the virus on Sandy Springs residents and businesses, with an emphasis on assisting low income citizens. To accomplish this, the City plans to distribute funds to local non-profits that serve those who are low or moderate income citizens as well as provide economic development loans to small businesses that serve or employ those who are of low or moderate income. The City will also explore other ways to assist in the pandemic response that comply with HUD guidelines, should they arise.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1.	Public Improvements & Infrastructure	2018	2022	Non-housing community development	42.75% LMI Census Tracts	Public Improvement & Infrastructure	CDBG \$625,188	Public facility or infrastructure activities other than low/moderate income housing. Benefit: 4830 Persons Assisted
2.	COVID-19 Pandemic Response	2020	TBD	Non-housing community development	52.5 % LMI Census Tracts	Public Service and Economic Development	\$653,208 & an additional CARES Act allocation of \$384,260	Public service and economic development activities that aid in COVID-19 relief

Table 54 – Goals Summary

#### Goal Descriptions

The project will improve connectivity in CDBG target areas along the Roswell Road transportation corridor. Ultimately, the City desires to construct 1.2 miles of sidewalk to improve the network in the identified target areas, install required ADA improvements and make other improvements to the existing sidewalk network where none currently exists. Streetscape improvements will take place along Roswell Road from Long Island Drive to the Prado and from Lake Placid Drive to Northwood Drive.

#### COVID-19 Pandemic Response

The City will allow local non-profits to apply for grants to aid them in their response to the COVID-19 pandemic. For a non-profit, this may include providing funding assisting families affected by COVID job loss with rent or utility payments or making improvements to their facilities that allow them to better and more efficiently serve the community. The City will also consider economic development loans to small

businesses that serve or employ those who are of low to moderate income. The City will also explore other ways to assist in the pandemic response in compliance with HUD guidelines, should they arise.



## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City of Sandy Springs began its participation in HUD's CDBG Program in 2008 and the City's 2008-12, continued under the 2013-2017 plan, identified a single priority for the first five years of its program: infrastructure improvements. Phase I and Phase II of the multi-year sidewalk project in the north-end of Roswell Road was completed. Now design and construction work have commenced for Phase III of the south-end portion of Roswell Road. As such, the City has determined that for the first year of the 2018-22 Consolidated Plan, continuation of Phase III construction should be the priority project. In light of the recent pandemic, the City has determined that for the 2020 program year, the Roswell Road sidewalk project, as well as the COVID-19 response will be the target for the funds, on an as needed basis. The City will allow local non-profits to apply for grants to aid them in their response to the COVID-19 pandemic. For a non-profit, this may include providing funding assistance to families affected by COVID-19 job loss with rent or utility payments or making improvements to their facilities that allow them to better and more efficiently serve the community. The City will also consider economic development loans to small businesses that serve or employ those who are of low to moderate income. The City will also explore other ways that comply with HUD guidelines to assist in the pandemic response, should they arise.

In summer 2017, the City applied for the Section 108 loan to obtain alternative financing in order to complete in a single effort the Phase III of the South Roswell Road Multi Year Project. In January 2018, HUD awarded the City of Sandy Springs the loan guarantee assistance under Section 108 in the principal amount of \$2.8 million. The 2020 grant allocation will still be anticipated to be used to defease the Section 108 loan debt. However, as stated above, the 2020 grant allocation may be used to partially fund the COVID-19 response, along with the CARES Act allocation.

#### Projects

#	Project Name
1.	South Roswell Road Multiyear Sidewalk Phase III
2.	COVID-19 Pandemic Response

Table 55 – Project Information

#### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Funding priorities are consistent with those outlined in the Strategic Plan. Relative to the proposed use of the CDBG funds for pedestrian improvements, the main obstacle is related to funding. Although the area has adequate right-of-way to accommodate the sidewalk plan, the City has limited financial resources. Traditionally, sidewalk projects in the Sandy Springs area have been completed in

conjunction with development or redevelopment projects. Because the target area is built-out, relying upon development to meet the mobility needs of the area is not an option.

In light of the recent pandemic, the City has determined that for the 2020 program year, the priority project will still be the Roswell Road sidewalk project, but should the need arise, be utilized for the COVID-19 response.

## AP-38 Project Summary

### Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding
Roswell Road Multiyear Sidewalk Program Phase III	42.75% LMI Census Tracts	Public Improvements & Infrastructure	Public Improvements & Infrastructure	CDBG: \$625,188
COVID-19 Response	52.5 % LMI Census Tracts	COVID-19 Response	Public Service and Economic Development	CDBG: \$653,208 CARES Act: \$384,260

Consolidated Plan

SANDY SPRINGS

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## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Phase III of the Roswell Road Multiyear Sidewalk Project will be completed in qualified target areas along the Roswell Road corridor. Phase III will be completed in two sub-phases: sub-phase I along Roswell Road from Longs Island Drive to the Prado, and Sub-phase 2:, along Roswell Road from Lake Placid Drive to Northwood Drive, specifically within Census Tracts 010212-1, 010212-3, 010113-2, 010113-1, 010114-1, and 010114-3. The 2020 grant allocation will still be anticipated to be used to defease the Section 108 loan debt. However, as stated above, the 2020 grant allocation may be used to partially fund the COVID-19 response, along with the CARES Act allocation.

### **Geographic Distribution**

Target Area	Percentage of Funds
42.75% LMI Census Tracts	100

**Table 56 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The geographic allocation of the City's CDBG funds is be guided by the determination that these funds can have the greatest impact when targeted to specific areas and leveraged with other local, state and federal investments. The CDBG LMI target area map is attached. As provide for at 24 CFR Part 570.208(a)(1)(ii), the City may elect to use these target areas to meet National Objective requirements for selected projects that specifically meet the Area Benefit category of activities.

For the 2020 program year, the City is not specifically allocating investments geographically as it is not the best strategy for distributing COVID-19 pandemic relief funds but the funds will still be targeted at those who are low to moderate income.

### **Exception Status**

It is important to also note that HUD has granted the City of Sandy Springs exception status based on the upper quartile calculation that permits the City to apply an LMI (low/moderate income) Area Benefit threshold of 42.75% to these project activities in the designated target areas. The map attached illustrates the U.S. Bureau of the Census Tracts where at least 42.75% of the resident population in Sandy Springs is LMI.

## **Discussion**

The project will improve pedestrian access to jobs, commercial and retail services, City parks, public transit, and other services for the Target Area.

The project, the COVID-19 Response, will help ameliorate the negative economic impacts of the current pandemic.